

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
Melissa M. Caldwell :
Debtor : Chapter 13
U.S. Bank National Association as :
Trustee, in trust on behalf of J.P. Morgan :
Mortgage Acquisition Trust 2006-CW 2 :
Movant :
v. : Answer to
: Motion for Relief from Stay
Melissa M. Caldwell :
and :
Jack N. Zaharopoulos, Trustee, :
Respondents :
:

DEBTOR'S REPLY TO MOTION
OF U.S. BANK NATIONAL ASSOCIATION
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, this 24th day of December 2024, comes the respondent, Melissa M. Caldwell, by and through her counsel, the CGA Law Firm, E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. The document speaks for itself.
5. Admitted.
6. Admitted.

7. It is admitted that the Debtor has failed to make certain post-petition mortgage payments because of some financial difficulties. The Debtor is working with a loan modification specialist from Saving Homes Today. She is actively pursuing a loan modification and will pay post-petition arrears in an Amended Plan.
8. Denied. The Debtor is unaware of the amount needed to reinstate the loan.
9. Denied. The Movant is not entitled to relief from the automatic stay.
10. Admitted. The Debtor intends to cure the Chapter 13 Plan payments before the Motion to Dismiss hearing scheduled for January 8, 2025.
11. Admitted. The debtor is unaware of whether, and to what extent, Movant has incurred legal expenses.
12. Denied. Paragraph 12 is a conclusion of law to which no response is required.

WHEREFORE, it is requested that the relief sought by U.S. Bank National Association, be denied.

Respectfully submitted,
CGA Law Firm

/s/E. Haley Rohrbaugh, Esquire
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
Counsel for Debtors
135 North George Street
York, PA 17401
(717) 848-4900

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

I IN RE: :
Melissa M. Caldwell :
Debtor : Chapter 13
U.S. Bank National Association as :
Trustee, in trust on behalf of J.P. Morgan :
Mortgage Acquisition Trust 2006-CW 2 :
Movant :
v. : Answer to
: Motion for Relief from Stay
Melissa M. Caldwell :
and :
Jack N. Zaharopoulos, Trustee, :
Respondents :
:

CERTIFICATE OF SERVICE

I hereby certify that on December 24, 2024, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee

Brent J. Lemon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/E. Haley Rohrbaugh, Esquire
E. Haley Rohrbaugh, Esquire